

Statement of Basis of the Federal Operating Permit

Targa Delaware LLC

Site Name: Wildcat Gas Plant

Physical Location: Midland Airport go S to I-20, on I-20 go W appx 60.0 Mi to State Hwy 115, go N for appx 15.5 Mi to FM 1232, NW appx 5.5 mi to Hwy 302, go W appx 2.3 mi, site is on South side of Hwy 302.

Nearest City: Kermit

County: Winkler

Permit Number: O4121

Project Type: Initial Issuance

The North American Industry Classification System (NAICS) Code: 211111

NAICS Name: Crude Petroleum and Natural Gas Extraction

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). An application for initial permit issuance has been submitted in accordance with 30 TAC § 122.201. This document may include the following information:

- A description of the facility/area process description;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: August 6, 2019

Operating Permit Basis of Determination

Permit Area Process Description

Inlet Separation

High pressure field gas flows into the plant through the HP Slug Catcher prior to combining with the discharge of the LP Inlet Compressors, then through Inlet gas metering & filtration and into the gas treating area. Low-pressure field gas flows into the plant and through the LP Slug Catcher prior to entering the LP Inlet Compressors, then combining with the HP Inlet gas. Separated liquids from the slug catchers are routed to the MP and LP flash tanks which serve as flash/water separators. These flash tanks also serve as the closed drain system for the plant and have dedicated compression for the vapors off each tank. Produced water is routed to the produced water storage tanks, and then offsite.

Condensate Stabilization Process

Raw condensate from the plant inlet is routed to a condensate stabilizer to aid in the recovery of hydrocarbons from the condensate stream. The cryo hot oil heater, also used by the plant cryogenic unit, will be used as the heating source for the condensate stabilizer. Liquids received are stabilized to RVP-9 and routed to pressurized storage tanks. Liquids stored in these pressurized tanks exit the facility via pressurized truck loading (EPN: FUG-2).

Gas Treating

After inlet separation and filtration, the inlet gas flows into the amine contactor, where the gas is contacted with an aqueous solution of amine to remove CO₂ and H₂S. CO₂ and H₂S exit from the bottom of the contactor with the rich amine which is heated and regenerated using the closed hot oil system in the amine regenerator. Hot oil is circulated and supplied by the amine hot oil heaters (EPNs: H-103, H-104). Flash tank vapors are routed to the LP flash tank at the plant inlet. The CO₂ and H₂S rich vent gas released from the regeneration process is routed to the proposed acid gas injection well at the site. When the acid gas injection well is down for maintenance, the vent gas is routed to the flare (EPN: FLARE-1). Treated gas (less CO₂ & H₂S) exits the amine contactor and is routed to the glycol dehydrator.

Gas Dehydration

Gas from the amine contactor then goes to the Glycol Contactor where water removal is accomplished by absorption with triethylene glycol (TEG). The rich TEG is then routed through a flash tank and to the TEG regenerator. The TEG is then regenerated using a hot oil-driven regeneration system with a dedicated TEG hot oil heater (EPN: H-105). Flash vapors from the flash tank are routed to the LP flash tank at the front of the plant. Any vapors from the TEG dehy still vent are routed to a system of redundant vapor recovery units (VRU) for 100% capture/control. Captured vapor is then routed to the LP flash tank.

Cryogenic Unit

Gas exits the glycol dehydrator and flows into the mole sieve dehydrator beds. Each dehydrator bed contains molecular sieve dehydration beads that adsorb trace amounts of water from the gas stream. Two vessels are used to dehydrate inlet gas while the third vessel is being regenerated. Dehydrated high pressure gas is used for regeneration. The regen gas flows to the regen heater (EPN: H-101). The hot gas flows from the heater to the dehydrator vessel being regenerated and water is removed from the molecular sieve by evaporation. The hot gas and vaporized water are cooled and the water is condensed and separated. The condensed water is routed to the plant produced water tank. The cooled regen gas is recompressed by the regen gas compressor and recycled to the inlet of the cryogenic unit. After mol sieve dehydration system, dry inlet gas goes through the dust filters and enters the cryogenic plant. The gas is then split, via flow ratio control, into two legs of processing--then meter, filter, and sent off-site via pipeline. The NGL product from the cryogenic unit is pumped through a sales meter and then off-site via pipeline. The residue gas from the cryogenic unit is compressed, metered, and sent to the residue gas pipeline.

Ancillary Tanks

The facility will store various products used to maintain the equipment and normal operations. These include lube and used oil tanks (EPNs: TK-1801, TK-1802, TK-4801, TK-4802, TK-8100), TEG tank (EPN: TK-3801), amine tanks (EPNs: TK-2801, TK-2802), deionized water tank (EPN: TK-2803), open drain tank (EPN: TK-1803), produced water tanks (EPNs: TK- 1805A, TK-1805B), lube oil drain sump (EPN: TK-1812), and open drain (condensate) sump (EPN: TK-1813).

Flare

FLARE-1 will be designed for smokeless operation and located at the facility for TO downtime, and routine MSS activities. The amine unit acid gas stream may be routed to the flare during TO downtime. During routine MSS activities and plant turnarounds, inlet gas and process gases may also be routed to FLARE-1. FLARE-2 will be designed for smokeless operation and located at the AGI well to control blowdowns from the acid gas well compressors.

FOPs at Site

The “application area” consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: O4034*

*Targa Delaware LLC, Wildcat Gas Plant operates under Title V General Operating Permit (GOP) O4034, which will be voided upon issuance of Site Operating Permit (SOP) O4121.

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	SO2
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Reading State of Texas’s Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as “applicable requirements”) that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
 - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
 - Additional Monitoring Requirements
 - New Source Review Authorization Requirements
 - Compliance Requirements
 - Protection of Stratosphere Ozone
 - Permit Location
 - Permit Shield (30 TAC § 122.148)
- Attachments
 - Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary
 - Additional Monitoring Requirements
 - Permit Shield
 - New Source Review Authorization References
 - Compliance Plan
 - Alternative Requirements
- Appendix A
 - Acronym list

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable

requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	No
CSAPR (Cross-State Air Pollution Rule)	No
Federal Implementation Plan for Regional Haze (Texas SO ₂ Trading Program)	No

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.

7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations

that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*
EG-1	40 CFR Part 60, Subpart JJJJ	60JJJJ-EG1	<p>Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification after June 12, 2006.</p> <p>Manufactured Date = Date of manufacture is on or after January 1, 2011.</p> <p>Test Cell = The SI ICE is not being tested at an engine test cell/stand.</p> <p>Certified = Purchased a non-certified SI ICE.</p> <p>Exemption = The SI ICE is not exempt.</p> <p>Temp Replacement = The SI ICE is not acting as a temporary replacement.</p> <p>Horsepower = Maximum engine power greater than or equal to 130 HP and less than 500 HP.</p> <p>Fuel = SI ICE that uses natural gas.</p> <p>Service = SI ICE is an emergency engine.</p> <p>Commencing = SI ICE that is commencing new construction.</p>
EG-1	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-EG1	<p>Crankcase = The stationary CI RICE is equipped with a closed crankcase ventilation system.</p> <p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than or equal to 300 HP and less than or equal to 500 HP.</p> <p>Performance Test = A performance test has been previously conducted that meets the conditions in 40 CFR § 63.6610(d)(1)-(5).</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.</p> <p>Control Technique = Control technique other than non-selective catalytic reduction</p> <p>Operating Limits = Using the control techniques approved in Subpart ZZZZ</p> <p>Monitoring System = Monitoring system other than a CPMS or CEMS</p>
EG-2	40 CFR Part 60, Subpart JJJJ	60JJJJ-EG2	<p>Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification after June 12, 2006.</p> <p>Manufactured Date = Date of manufacture is on or after January 1, 2011.</p> <p>Test Cell = The SI ICE is not being tested at an engine test cell/stand.</p> <p>Certified = Purchased a non-certified SI ICE.</p> <p>Exemption = The SI ICE is not exempt.</p> <p>Temp Replacement = The SI ICE is not acting as a temporary replacement.</p> <p>Horsepower = Maximum engine power greater than or equal to 130 HP and less than 500 HP.</p> <p>Fuel = SI ICE that uses natural gas.</p> <p>Service = SI ICE is an emergency engine.</p> <p>Commencing = SI ICE that is commencing new construction.</p>
EG-2	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-EG2	<p>Crankcase = The stationary CI RICE is equipped with a closed crankcase ventilation system.</p> <p>HAP Source = The site is an area source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than or equal to 300 HP and less than or equal to 500 HP.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Performance Test = A performance test has been previously conducted that meets the conditions in 40 CFR § 63.6610(d)(1)-(5).</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.</p> <p>Control Technique = Control technique other than non-selective catalytic reduction</p> <p>Operating Limits = Using the control techniques approved in Subpart ZZZZ</p> <p>Monitoring System = Monitoring system other than a CPMS or CEMS</p>
GRP-PWTKS	40 CFR Part 60, Subpart Kb	60KB-GRPPWTKS	<p>Product Stored = Petroleum liquid (other than petroleum or condensate)</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>
GRP-SMALLTKS	40 CFR Part 60, Subpart Kb	60KB-GRPSMALLTK	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>
H-101	40 CFR Part 60, Subpart Dc	60DC-0001	<p>Construction/Modification Date = After February 28, 2005.</p> <p>Maximum Design Heat Input Capacity = Maximum design heat input capacity is less than 10 MMBtu/hr (2.9 MW).</p>
H-102	40 CFR Part 60, Subpart Dc	60DC-0002	<p>Construction/Modification Date = After February 28, 2005.</p> <p>PM Monitoring Type = No particulate monitoring.</p> <p>Maximum Design Heat Input Capacity = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW).</p> <p>SO₂ Inlet Monitoring Type = No SO₂ monitoring.</p> <p>Other Subparts = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB.</p> <p>SO₂ Outlet Monitoring Type = No SO₂ monitoring.</p> <p>Heat Input Capacity = Heat input capacity is greater than 10 MMBtu/hr (2.9 MW) but less than 30 MMBtu/hr (8.7 MW).</p> <p>Technology Type = None.</p> <p>D-Series Fuel Type = Natural gas.</p> <p>47C-Option = COMS exemption § 60.47c(e) for a facility not using post-combustion technology (except a wet scrubber), burns only gaseous fuels or fuel oils that contain no more than 0.5 % by weight sulfur, and emissions of CO are 0.15 lb/MMBtu average.</p> <p>ACF Option - SO₂ = Other ACF or no ACF.</p> <p>ACF Option - PM = Other ACF or no ACF.</p> <p>30% Coal Duct Burner = The facility does not combust coal in a duct burner as part of a combined cycle system; or more than 30% of the heat is from combustion of coal and less than 70% is from exhaust gases entering the duct burner.</p>
H-103	40 CFR Part 60, Subpart Dc	60DC-0002	<p>Construction/Modification Date = After February 28, 2005.</p> <p>PM Monitoring Type = No particulate monitoring.</p> <p>Maximum Design Heat Input Capacity = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW).</p> <p>SO₂ Inlet Monitoring Type = No SO₂ monitoring.</p> <p>Other Subparts = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>SO₂ Outlet Monitoring Type = No SO₂ monitoring.</p> <p>Heat Input Capacity = Heat input capacity is greater than or equal to 30 MMBtu/hr (8.7 MW) but less than or equal to 75 MMBtu/hr (22 MW).</p> <p>Technology Type = None.</p> <p>D-Series Fuel Type = Natural gas.</p> <p>47C-Option = COMS exemption § 60.47c(e) for a facility not using post-combustion technology (except a wet scrubber), burns only gaseous fuels or fuel oils that contain no more than 0.5 % by weight sulfur, and emissions of CO are 0.15 lb/MMBtu average.</p> <p>ACF Option - SO₂ = Other ACF or no ACF.</p> <p>ACF Option - PM = Other ACF or no ACF.</p> <p>30% Coal Duct Burner = The facility does not combust coal in a duct burner as part of a combined cycle system; or more than 30% of the heat is from combustion of coal and less than 70% is from exhaust gases entering the duct burner.</p>
H-104	40 CFR Part 60, Subpart Dc	60DC-0002	<p>Construction/Modification Date = After February 28, 2005.</p> <p>PM Monitoring Type = No particulate monitoring.</p> <p>Maximum Design Heat Input Capacity = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW).</p> <p>SO₂ Inlet Monitoring Type = No SO₂ monitoring.</p> <p>Other Subparts = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB.</p> <p>SO₂ Outlet Monitoring Type = No SO₂ monitoring.</p> <p>Heat Input Capacity = Heat input capacity is greater than or equal to 30 MMBtu/hr (8.7 MW) but less than or equal to 75 MMBtu/hr (22 MW).</p> <p>Technology Type = None.</p> <p>D-Series Fuel Type = Natural gas.</p> <p>47C-Option = COMS exemption § 60.47c(e) for a facility not using post-combustion technology (except a wet scrubber), burns only gaseous fuels or fuel oils that contain no more than 0.5 % by weight sulfur, and emissions of CO are 0.15 lb/MMBtu average.</p> <p>ACF Option - SO₂ = Other ACF or no ACF.</p> <p>ACF Option - PM = Other ACF or no ACF.</p> <p>30% Coal Duct Burner = The facility does not combust coal in a duct burner as part of a combined cycle system; or more than 30% of the heat is from combustion of coal and less than 70% is from exhaust gases entering the duct burner.</p>
H-105	40 CFR Part 60, Subpart Dc	60DC-0001	<p>Construction/Modification Date = After February 28, 2005.</p> <p>Maximum Design Heat Input Capacity = Maximum design heat input capacity is less than 10 MMBtu/hr (2.9 MW).</p>
FLARE-1	30 TAC Chapter 111, Visible Emissions	R111-FLARE	<p>Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1.</p> <p>Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.</p>
FLARE-1	40 CFR Part 60, Subpart A	60A-FLARE	<p>Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18.</p> <p>Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4)(i)-(iii) or (c)(5).</p> <p>Flare Assist Type = Air-assisted</p>

Unit ID	Regulation	Index Number	Basis of Determination*
FLARE-1	40 CFR Part 63, Subpart A	63A-FLARE	Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.
FLARE-2	30 TAC Chapter 111, Visible Emissions	R111-FLARE	Acid Gases Only = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. Emergency/Upset Conditions Only = Flare is used under conditions other than emergency or upset conditions.
FLARE-2	40 CFR Part 60, Subpart A	60A-FLARE	Subject to 40 CFR § 60.18 = Flare is subject to 40 CFR § 60.18. Adhering to Heat Content Specifications = Adhering to the heat content specifications in 40 CFR § 60.18(c)(3)(ii) and the maximum tip velocity specifications in 40 CFR § 60.18(c)(4)(i)-(iii) or (c)(5). Flare Assist Type = Air-assisted
FLARE-2	40 CFR Part 63, Subpart A	63A-FLARE	Required Under 40 CFR Part 63 = Flare is not required by a Subpart under 40 CFR Part 63.
AMINE-1	30 TAC Chapter 112, Sulfur Compounds	R112-AMINE1	Sulfur Recovery Plant = The gas sweetening unit is not using sulfur recovery.
AMINE-1	40 CFR Part 60, Subpart LLL	60LLL-AMINE1	Onshore = The sweetening unit is located onshore at a gas processing plant. Construction Date = After August 23, 2011.
AMINE-1	40 CFR Part 60, Subpart OOOOa	60OOOOa-2	Construction/Reconstruction/Modification Date = After September 18, 2015.
C-1101	40 CFR Part 60, Subpart OOOOa	60OOOOa-3	Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Centrifugal Compressor.
C-1102	40 CFR Part 60, Subpart OOOOa	60OOOOa-3	Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Centrifugal Compressor.
C-1102A	40 CFR Part 60, Subpart OOOOa	60OOOOa-3	Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Centrifugal Compressor.
C-1103	40 CFR Part 60, Subpart OOOOa	60OOOOa-3	Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Centrifugal Compressor.
C-1104	40 CFR Part 60, Subpart OOOOa	60OOOOa-3	Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Centrifugal Compressor.
C-1104A	40 CFR Part 60, Subpart OOOOa	60OOOOa-3	Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Centrifugal Compressor.

Unit ID	Regulation	Index Number	Basis of Determination*
C-1105	40 CFR Part 60, Subpart OOOOa	600000a-3	Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Centrifugal Compressor.
C-1106	40 CFR Part 60, Subpart OOOOa	600000a-3	Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Centrifugal Compressor.
C-1107	40 CFR Part 60, Subpart OOOOa	600000a-3	Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Centrifugal Compressor.
C-1108	40 CFR Part 60, Subpart OOOOa	600000a-3	Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Centrifugal Compressor.
C-5101	40 CFR Part 60, Subpart OOOOa	600000a-3	Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Centrifugal Compressor.
C-5102	40 CFR Part 60, Subpart OOOOa	600000a-3	Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Centrifugal Compressor.
C-5103	40 CFR Part 60, Subpart OOOOa	600000a-3	Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Centrifugal Compressor.
C-5104	40 CFR Part 60, Subpart OOOOa	600000a-3	Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Centrifugal Compressor.
C-5107	40 CFR Part 60, Subpart OOOOa	600000a-3	Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Centrifugal Compressor.
FUG-1	40 CFR Part 60, Subpart KKK	60KKK-1	Facility Type = Affected facility is the group of all equipment except compressors within a process unit. Construction/Modification Date = After August 23, 2011.
FUG-1	40 CFR Part 60, Subpart OOOOa	600000a-1	Construction/Reconstruction/Modification Date = After September 18, 2015. Affected Facility Type = Fugitive emissions components at a compressor station.
V-1	40 CFR Part 63, Subpart HH	63HH-V1	Alternate Means of Emission Limitation (AMEL) = The EPA Administrator has not approved an alternate means of emission limitation in accordance with 40 CFR § 63.777 or no alternate has been requested. Control Device Type = Condenser. Process Vent Control = Process vent is connected to a process natural gas line. HAP Source = Stationary of source of HAPs that is not a major source as defined in 40 CFR § 63.761. Affected Source Type = Triethylene glycol (TEG) dehydration unit not located within an UA plus offset and UC boundary. Area Source Exemption = The TEG unit does not meet an exemption in 40 CFR § 63.764(e)(1).

* - The “unit attributes” or operating conditions that determine what requirements apply

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room,

located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. In addition, many of the permits are accessible online through the link provided below. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. Permit by Rule (PBR) registrations submitted by permittees are also available online through the link provided below. The following table specifies the PBRs that apply to the site.

The TCEQ has interpreted the emission limits prescribed in 30 TAC §106.4(a) as both emission thresholds and default emission limits. The emission limits in 30 TAC §106.4(a) are all considered applicable to each facility as a threshold matter to ensure that the owner/operator qualifies for the PBR authorization. Those same emission limits are also the default emission limits if the specific PBR does not further limit emissions or there is no lower, certified emission limit claimed by the owner/operator.

This interpretation is consistent with how TCEQ has historically determined compliance with the emission limits prior to the addition of the “as applicable” language. The “as applicable” language was added in 2014 as part of changes to the sentence structure in a rulemaking that made other changes to address greenhouse gases and was not intended as a substantive rule change. This interpretation also provides for effective and practical enforcement of 30 TAC §106.4(a), since for the TCEQ to effectively enforce the emission limits in 30 TAC §106.4(a) as emission thresholds, all emission limits must apply. As provided by 30 TAC §106.4(a)(2) and (3), an owner/operator shall not claim a PBR authorization if the facility is subject to major New Source Review. The practical and legal effect of the language in 30 TAC § 106.4 is that if a facility does not emit a pollutant, then the potential to emit for that particular pollutant is zero, and thus, the facility is not authorized to emit the pollutant pursuant to the PBR.

The status of air permits, applications, and PBR registrations may be found by performing the appropriate search of the databases located at the following website:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

Details on how to search the databases are available in the **Obtaining Permit Documents** section below.

New Source Review Authorization References

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 150465	Issuance Date: 01/25/2019
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.511	Version No./Date: 09/04/2000

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the “Maximum Allowable Emission Rate Table”, or “MAERT” for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Obtaining Permit Documents

The New Source Review Authorization References table in the FOP specifies all NSR authorizations that apply at the permit area covered by the FOP. Individual NSR permitting files are located in the TCEQ Central File Room (TCEQ Main Campus located at 12100 Park 35 Circle, Austin, Texas, 78753, Building E, Room 103). They can also be obtained electronically from TCEQ's Central File Room Online (<https://www.tceq.texas.gov/goto/cfr-online>). Guidance documents that describe how to search electronic records, including Permits by Rule (PBRs) or NSR permits incorporated by reference into an FOP, archived in the Central File Room server are available at https://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

All current PBRs are contained in Chapter 106 and can be viewed at the following website:

https://www.tceq.texas.gov/permitting/air/permitbyrule/air_pbr_index.html

Previous versions of 30 TAC Chapter 106 PBRs may be viewed at the following website:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

Historical Standard Exemption lists may be viewed at the following website:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

Additional information concerning PBRs is available on the TCEQ website:

https://www.tceq.texas.gov/permitting/air/nav/air_pbr.html

Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on April 17, 2019.

Site rating: Unclassified Company rating: Unclassified

(*High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55*)

2. Has the permit changed on the basis of the compliance history or site/company rating?No

Permit reviewer notes:

- Applicant has insufficient compliance history to generate a rating.

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS?No

2. Is a compliance plan and schedule included in the permit?No

Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes
OP-UA3 - Storage Tank/Vessel Attributes
OP-UA4 - Loading/Unloading Operations Attributes
OP-UA5 - Process Heater/Furnace Attributes
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes
OP-UA7 - Flare Attributes
OP-UA8 - Coal Preparation Plant Attributes
OP-UA9 - Nonmetallic Mineral Process Plant Attributes
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes
OP-UA11 - Stationary Turbine Attributes
OP-UA12 - Fugitive Emission Unit Attributes
OP-UA13 - Industrial Process Cooling Tower Attributes
OP-UA14 - Water Separator Attributes
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
OP-UA16 - Solvent Degreasing Machine Attributes
OP-UA17 - Distillation Unit Attributes
OP-UA18 - Surface Coating Operations Attributes
OP-UA19 - Wastewater Unit Attributes
OP-UA20 - Asphalt Operations Attributes
OP-UA21 - Grain Elevator Attributes
OP-UA22 - Printing Attributes
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
OP-UA25 - Synthetic Fiber Production Attributes
OP-UA26 - Electroplating and Anodizing Unit Attributes
OP-UA27 - Nitric Acid Manufacturing Attributes
OP-UA28 - Polymer Manufacturing Attributes
OP-UA29 - Glass Manufacturing Unit Attributes
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
OP-UA31 - Lead Smelting Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes
OP-UA33 - Metallic Mineral Processing Plant Attributes
OP-UA34 - Pharmaceutical Manufacturing
OP-UA35 - Incinerator Attributes
OP-UA36 - Steel Plant Unit Attributes
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes
OP-UA40 - Ferroalloy Production Facility Attributes
OP-UA41 - Dry Cleaning Facility Attributes
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-UA43 - Sulfuric Acid Production Attributes
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes
OP-UA45 - Surface Impoundment Attributes
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes
OP-UA47 - Ship Building and Ship Repair Unit Attributes
OP-UA48 - Air Oxidation Unit Process Attributes
OP-UA49 - Vacuum-Producing System Attributes
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
OP-UA51 - Dryer/Kiln/Oven Attributes
OP-UA52 - Closed Vent Systems and Control Devices

OP-UA53 - Beryllium Processing Attributes
OP-UA54 - Mercury Chlor-Alkali Cell Attributes
OP-UA55 - Transfer System Attributes
OP-UA56 - Vinyl Chloride Process Attributes
OP-UA57 - Cleaning/Depainting Operation Attributes
OP-UA58 - Treatment Process Attributes
OP-UA59 - Coke By-Product Recovery Plant Attributes
OP-UA60 - Chemical Manufacturing Process Unit Attributes
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes
OP-UA62 - Glycol Dehydration Unit Attributes
OP-UA63 - Vegetable Oil Production Attributes